

The Honorable James L. Robart

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

In accordance with the Court's statement during the *Daubert* hearing on October 18, 2012, VTech Communications, Inc. ("VTech") hereby joins Motorola's Motion to Seal Documents and Trial Testimony and Exclude Unauthorized Persons From the Courtroom During Testimony Regarding Trade Secrets (Dkt. No. 495) as it pertains to the VTech-Motorola license and testimony regarding the terms of that license.

Motorola has stated that it anticipates that the parties will seek to elicit testimony regarding the terms of various licenses between Motorola and third parties, possibly including the license between VTech and Motorola. *See* Dkt. No. 495 at 16. As Motorola has explained

NOTICE OF NONPARTY VTECH COMMUNICATIONS,
INC.'S JOINDER IN DEFENDANTS' MOTION TO SEAL
DOCUMENTS AND EXCLUDE UNAUTHORIZED
PERSONS FROM THE COURTROOM - 1
NO. C10-1823JLR
#869705 v1 / 01318-002

Law Offices
KARR TUTTLE CAMPBELL
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1 (id.), such testimony would necessarily be about “information that plainly falls within the
2 definition of ‘trade secrets.’” *See In re Elec. Arts*, 298 F. App’x at 569-70. For the same
3 reasons the VTech-Motorola license should be sealed, unauthorized persons should be excluded
4 from the courtroom throughout testimony regarding the terms of that license.

5 In support of this notice, VTech offers the Declaration of Kenton Erwin, submitted
6 concurrently herewith.

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8 RESPECTFULLY SUBMITTED this 1st day of November, 2012.

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28 NOTICE OF NONPARTY VTECH COMMUNICATIONS,
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CERTIFICATE OF SERVICE

I hereby certify that on November 1, 2012, I electronically filed the foregoing with the Clerk of the Court for the United States District Court for the Western District of Washington by using the appellate CM/ECF system.

I certify that for all parties in the case who are registered as CM/ECF users, service will be accomplished by the CM/ECF System.

Dated: November 1, 2012.

KARR TUTTLE CAMPBELL

s/ Walter E. Barton

Walter E. Barton

For VTech Communications, Inc.

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